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10 Attorneys for Plaintiff  
11 United States of America

12  
13 IN THE UNITED STATES DISTRICT COURT  
14  
15 EASTERN DISTRICT OF CALIFORNIA

16 UNITED STATES OF AMERICA,

17 Plaintiff,

18 v.

19 TERRANCE JOHN COX,  
20 AKA TJ COX,

21 Defendant.

22 CASE NO. 1:22-CR-00214 ADA-BAM

23 STIPULATION AND PROTECTIVE ORDER  
24 BETWEEN THE UNITED STATES AND  
25 DEFENDANT

26 COURT: Hon. Barbara A. McAuliffe

27 WHEREAS, the discovery in this case is voluminous and contains a large amount of personal  
28 and confidential information including but not limited to dates of birth, telephone numbers, residential  
addresses, social security numbers and other confidential information (“Protected Information”); and

29 WHEREAS, the parties desire to avoid both the necessity of large scale redactions and the  
30 unauthorized disclosure or dissemination of this information to anyone not a party to the court  
31 proceedings in this matter;

32 The parties agree that entry of a stipulated protective order is appropriate.

33 THEREFORE, Defendant TERRANCE JOHN COX, by and through his counsel of record  
34 (“Defense Counsel”), and the United States of America, by and through Assistant United States  
35 Attorneys Henry Z. Carbajal III and Jeffrey A. Spivak, hereby agree and stipulate as follows:

36 1. This Court may enter a protective order pursuant to Rule 16(d) of the Federal Rules of  
37 Criminal Procedure, and its general supervisory authority.

1       2. This Order pertains to all discovery provided to or made available to Defense Counsel as  
2 part of discovery in this case (hereafter, collectively known as “the discovery”).

3       3. By signing this Stipulation and Protective Order, Defense Counsel agrees not to share any  
4 documents that contain Protected Information with anyone other than Defense Counsel attorneys,  
5 designated defense investigators, and support staff. Defense Counsel may permit the Defendant to view  
6 unredacted documents in the presence of his attorney, defense investigators, and support staff. The  
7 parties agree that Defense Counsel, defense investigators, and support staff shall not allow the  
8 Defendant to copy Protected Information contained in the discovery, except as agreed to by the United  
9 States of America (“Government”). The parties agree that Defense Counsel, defense investigators, and  
10 support staff may provide the Defendant with copies of documents from which Protected Information  
11 has been redacted.

12       4. To the extent possible, to alleviate the time burden associated with defense counsel  
13 redacting Protected Information to give defendant copies of discovery documents, the government will  
14 endeavor to identify categories of documents and/or Bates ranges of produced discovery documents that  
15 may be provided to the defendant for temporary review without redaction.

16       5. The discovery and information therein may be used only in connection with the litigation  
17 of this case and for no other purpose. The discovery is now and will forever remain the property of the  
18 Government. Defense Counsel will return the discovery to the Government or certify that it has been  
19 shredded at the conclusion of the case.

20       6. Defense Counsel will store the discovery in a secure place and will use reasonable care to  
21 ensure that it is not disclosed to third persons in violation of this agreement.

22       7. Defense Counsel shall be responsible for advising the Defendant, employees, and other  
23 members of the defense team, and defense witnesses of the contents of this Stipulation and Order.

24       8. In the event that Defendant substitutes counsel, undersigned Defense Counsel agrees to  
25 withhold discovery from new counsel unless and until substituted counsel agrees also to be bound by  
26 this Order.

27       ///

28       ///

1 IT IS SO STIPULATED.

2 Dated: September 12, 2022

PHILLIP A. TALBERT  
United States Attorney

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4 By: /s/ Henry Z. Carbajal III  
HENRY Z. CARBAJAL III  
5 JEFFREY A. SPIVAK  
6 Assistant United States Attorney

7 Dated: September 12, 2022

8 By: /s/ Mark Coleman  
9 MARK COLEMAN  
Attorney for Defendant  
TERRANCE J. COX

10 IT IS SO ORDERED.

11 Dated: September 12, 2022

12 /s/ Barbara A. McAuliffe

13 UNITED STATES MAGISTRATE JUDGE